



"I will stand for my client's rights.  
I am a trial lawyer."  
—Ron Motley (1944–2013)

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August 15, 2024

**BY ECF**

Hon. Arun Subramanian, United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *Jane Doe 1 v. Gov't of the U.S. Virgin Islands, et al.*, Case No. 1:23-cv-10301-AS  
(S.D.N.Y.) – Letter Motion Requesting 5-page Extension for Reply Brief

Dear Judge Subramanian:

I write on behalf of Defendant Government of the United States Virgin Islands to request leave to submit a 10-page Reply Memorandum in support of the Government's Motion to Dismiss, a 5-page enlargement from the limit set forth in ¶ 8(C) of the Court's Individual Practices.

Despite filing an 83-page Opposition to the Motion yesterday (without having first sought leave to do so or consent of Defendants<sup>1</sup>), counsel for Plaintiffs advised that they would not consent to this request.

We recognize the burden that lengthy briefing places on the Court, and we have no desire to unnecessarily increase the Court's caseload. We do not make this request lightly, but, in these circumstances, a 5-page reply brief is insufficient to permit adequate response to Plaintiffs' 83-page memorandum, much of which seeks to address the Government's arguments.

In the previous round of briefing on Plaintiffs' First Amended Complaint, the Court limited all Defendants to a joint reply brief. We respectfully request the Court not impose a similar limitation here. Limiting Defendants to a single Reply brief does not permit Defendants to offer separate arguments if in the best interest of their clients.

For these reasons, we respectfully request leave to permit the Government to file a Reply brief of no more than 10 pages.

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<sup>1</sup> We note that, in the previous round of briefing on Plaintiffs' First Amended Complaint, the Court rejected Plaintiffs' request to file a 90-page response and limited them to "no more than 60 pages." Dkt. 81.



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To the extent the Court has additional questions regarding this request, we will make ourselves available to answer them.

Respectfully submitted,

*/s/ David I. Ackerman*

David I. Ackerman

cc: Counsel of record (via ECF)